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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 * * * *

10 **UNITED STATES OF AMERICA**)
)
11 **Plaintiff,**)
)
12 **v.**) **CASE NO: 2:15-cr-285-APG-GWF**
)
13 **CHARLES BURTON RITCHIE,**)
BENJAMIN GALECKI,)
14 **RYAN MATTHEW EATON,**)
)
15 **Defendants.**)
16 _____)

17 **STIPULATION AND ORDER REGARDING DEFENSE WITNESSES**
18 **ADAM LIBBY AND TIMOTHY DANDAR**

19 **IT IS HEREBY STIPULATED and AGREED** by and between James E. Keller, Assistant
20 United States Attorney, Cole Arnold Radovich and Jason Ruiz, U.S. Department of Justice, and
21 David Z. Chesnoff and Richard A. Schonfeld, attorneys for Defendant, Benjamin Galecki and John
22 Lloyd Snook, III, attorney for Defendant, Charles Burton Ritchie, and Shawn R. Perez, attorney for
23 Defendant, Ryan Matthew Eaton, that:

24 **///**
25
26

1 1. Adam Libby and Timothy Dandar have been named as witnesses for the Defendants and have
2 been served with Subpoenas. Both witnesses reside out of the State of Nevada.

3 2. If called to testify at trial, Adam Libby would invoke his rights under the Fifth Amendment
4 as to all questions.

5 3. If called to testify at trial, Timothy Dandar would invoke his rights under the Fifth
6 Amendment as to all questions.
7

8 ///

13 ///

19 ///

1 4. The Parties therefore stipulate that rather than calling Timothy Dandar and Adam Libby
2 outside of the presence of the jury to have them invoke their rights under the Fifth
3 Amendment, that this Stipulation and Order will serve as though said witnesses appeared at
4 the trial in this matter, and on the record, but outside the presence of the jury, invoked their
5 rights under the Fifth Amendment as to all questions.
6

7 **IT IS SO STIPULATED.**

8 **DATED** this 27th day of June, 2019.

9 **UNITED STATES ATTORNEY**

CHESNOFF & SCHONFELD

10 /s/

11 **JAMES E. KELLER, AUSA**

100 West Liberty
12 Reno, Nevada 89501
Attorney for Plaintiff

/s/

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Attorneys for Defendant,
Benjamin Galecki

14 /s/

15 **COLE RADOVICH, Trial Attorney**

JASON RUIZ, Trial Attorney

16 Narcotic and Dangerous Drug Section
Criminal Division / U.S. Department of Justice
17 145 N Street NE / Second Floor, East Wing
Washington D.C. 20530

19 /s/

20 **JOHN LLOYD SNOOK, III**

Snook & Haughey, P.C.
408 East Market Street, Suite 107
21 Charlottesville, Virginia 22902
Attorney for Defendant, Charles Burton Ritchie

23 /s/

24 **SHAWN R. PEREZ, ESQ.**

7121 W. Craig Rd., #113-38
Las Vegas, Nevada 89129
25 Attorney for Defendant, Ryan Matthew Eaton


1 **ORDER**

2 Based upon the above Stipulation of counsel, and with good cause appearing, the Court
3 finds that:

- 4 1. Adam Libby and Timothy Dandar have been named as witnesses for the Defendants and have
5 been served with Subpoenas. Both witnesses reside out of the State of Nevada.
6
7 2. If called to testify at trial, Adam Libby would invoke his rights under the Fifth Amendment
8 as to all questions.
9
10 3. If called to testify at trial, Timothy Dandar would invoke his rights under the Fifth
11 Amendment as to all questions.
12
13 4. The Parties therefore stipulate that rather than calling Timothy Dandar and Adam Libby
14 outside of the presence of the jury to have them invoke their rights under the Fifth
15 Amendment, that this Stipulation and Order will serve as though said witnesses appeared at
16 the trial in this matter, and on the record, but outside the presence of the jury, invoked their
rights under the Fifth Amendment as to all questions.

17 **IT IS SO ORDERED.**

18 Dated: June 27, 2019.

19 
20 **HONORABLE ANDREW GORDON**
21 **UNITED STATES DISTRICT JUDGE**

22 Respectfully Submitted by:

23 /s/

24 **RICHARD A. SCHONFELD, ESQ.**

25 Nevada Bar No. 6815

26 Attorney for Defendant Benjamin Galecki